



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

JUL 14 2014

Western Area Power Administration  
Upper Great Plains Region  
P.O. Box 35800  
Billings, MT 59107

Dear Mr. Marsh:

RE: Draft Environmental Impact Statement, Interconnection of the Grande Prairie Wind Farm, Holt County, Nebraska, June 2014 (CEQ# 20140171)

The U.S. Environmental Protection Agency has received and reviewed the Department of Energy's referenced Draft EIS pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

EPA agrees with Western's assessment that wind power has enormous benefits for the human environment, and we want to see this project move forward in as timely a manner as possible. After a thorough review, EPA has rated this DEIS as EC-2 (Environmental Concerns-Insufficient Information). A copy of EPA's rating definitions is enclosed. The EC-2 rating is based on several concerns raised from the DEIS having no alternatives for the decision maker or public to choose from.

This DEIS has only the proposed alternative and a no build alternative. This is inconsistent with 40 C.F.R. 1502.14 "Alternatives Including the Proposed Action." EPA believes it is reasonable to assume many alternatives have been considered and eliminated during the NEPA process, but were excluded by DOE for unknown reasons; EPA recommends including other alternatives based on site locations considered, types of energy considered, and types of wind turbines considered (conventional and unconventional).

Given the number of bird and bat strikes from conventional wind turbines, were there any considerations to unconventional wind turbines? If so, why were they discarded as alternatives? What, if any, considerations were given to the use of a turbine that minimizes bird/bat strikes? EPA recommends including answers to these questions in the Final EIS to better inform both the public and decision maker.

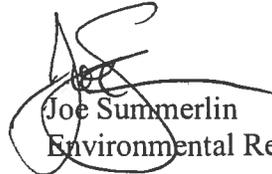
The DEIS also states on several different occasions that land owners may be willing to waive the minimum ½ mile rule for wind turbines. Could Western work with those residents and the energy supplier to invest in smaller or unconventional turbine systems, especially given that residents may not fully understand the long-term health and aesthetic issues associated with conventional three-bladed horizontal-axis wind turbines? EPA recommends including answers to these questions in the Final EIS to better inform both the public and decision maker.



Although the area selected in Holt County, Nebraska might be the best spot for a new wind farm, what other sites were considered and why were those sites not selected? EPA recommends including at least one other site that was studied and why it was eliminated as an alternative in the Final EIS.

EPA appreciates the opportunity to provide comments regarding this project. If you have any questions regarding this letter, please contact me at 913-551-7029 or at [summerlin.joe@epa.gov](mailto:summerlin.joe@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to be 'JS', with a large, stylized flourish that loops around the text below.

Joe Summerlin  
Environmental Review Coordinator on Energy

Enclosure

According to 40 C.F.R. 1502.14, “Alternatives Including the Proposed Action”:

*This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (§ 1502.15) and the Environmental Consequences (§ 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. In this section agencies shall:*

- (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, and briefly discuss the reasons for their having been eliminated.*
- (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.*
- (c) Include reasonable alternatives not within the jurisdiction of the lead agency.*
- (d) Include the alternative of no action.*
- (e) Identify the agency’s preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.*
- (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.*

### **Environmental Impact Statement Rating System Criteria**

EPA has developed a set of criteria for rating draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft EIS.

- Rating the Environmental Impact of the Action
- Rating the Adequacy of the Draft Environmental Impact Statement (EIS)

### **RATING THE ENVIRONMENTAL IMPACT OF THE ACTION**

- **LO (Lack of Objections)** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns)** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections)** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may

require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. *Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;*
  2. *Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;*
  3. *Where there is a violation of an EPA policy declaration;*
  4. *Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or*
  5. *Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.*
- **EU (Environmentally Unsatisfactory)** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
    1. *The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;*
    2. *There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or*
    3. *The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.*

## **RATING THE ADEQUACY OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT**

1. **(Adequate)** The draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
2. **(Insufficient Information)** The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3. **(Inadequate)** The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.